

August 06, 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY: _____ CC _____
DEPUTY

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS

PAMELA DESOMOV, aka PAMELA JOY DE SOMOV, aka PAM DE SOMOV, aka PAMELA DE SOMOV, aka PAMELA SOMOV, aka PAM DESOMOV, aka DEE SOMOV, aka DEE DE SOMOV, aka DEE DEE SOMOV, aka PAMELA SPENCER aka PAM SPENCER aka PAMELA JOY POLLACK, aka PAM POLLACK, aka PAMELA JOY WESTERLINE, aka PAMELA WESTERLINE aka PAM WESTERLINE, aka LAURENT GELBART, aka LAURIE GELBART, aka LAUREN DECKER, aka JUANITA NANCY SIMS, aka JUANITA SIMS, aka NANCY SIMS, aka CHRIS DE SOMOV, aka CHRISTINE DE SOMOV, aka CHRISSY DE SOMOV, aka CHRISTOPHER DE SOMOV, aka NICKY DESOMOV, aka NICOLE DE SOMOV, aka NICHOLAS DE SOMOV, aka PAMELA WRIGHT, aka PAM WRIGHT, aka PAMELA SOMOV SPENCER, aka, PAMELA JOY SOMOV SPENCER, aka PAM SOMOV SPENCER

Plaintiff

VS

Julie Barnes and Margaret Sano

Defendants

Civil Action Number 1:25 CV 00717 RP DH

DEFENDANTS' MOTION FOR PROTECTIVE ORDER AND REQUEST FOR ORDER OF PROTECTION

TO THE HONORABLE COURT:

COME NOW Defendants Julie Barnes and Meg Sano, appearing pro se, and respectfully move this Court for an Order of Protection against Plaintiff Pamela De Somov to prevent further harassment, intimidation, retaliatory contact, and abuse of process. In support of this motion, Defendants state as follows:

I. INTRODUCTION

Plaintiff has engaged in an escalating pattern of **harassing and retaliatory conduct** both inside and outside of these legal proceedings. Her filings, communications, and actions have caused emotional distress, reputational harm, and a **well-founded fear for the safety and well-being** of the Defendants.

Defendants are requesting that this Court enter an Order protecting them from further retaliation, direct or indirect contact, and misuse of law enforcement channels for the purpose of intimidation.

II. BASIS FOR REQUEST

Plaintiff's conduct includes, but is not limited to:

- Submitting repeated **frivolous motions** and sealed filings that misrepresent facts and target Defendants with defamatory and false accusations;
- **Misusing sealed filings** to conceal fabricated evidence and prevent a proper defense;
- Attempting to involve **law enforcement** against Defendants based on false allegations;
- Creating or encouraging **third-party interference** or intimidation through agents, associates, or witnesses;
- Filing this lawsuit in an improper venue and continuing to **delay, obstruct, or retaliate** through court filings after being advised against such behavior.

These actions are not based in legitimate legal claims but are instead designed to **intimidate, silence, and retaliate** against Defendants for protected speech and lawful conduct.

III. AUTHORITY

This Court has the **inherent power** to issue protective orders to safeguard the fair administration of justice and to prevent abuse of process. See *Chambers v. NASCO, Inc.*, 501 U.S. 32, 43 (1991); *Roadway Express, Inc. v. Piper*, 447 U.S. 752, 764–65 (1980).

In addition, under Rule 26(c) of the Federal Rules of Civil Procedure, courts may enter protective orders to shield parties from **annoyance, embarrassment, oppression, or undue burden or expense**.

The Court may also issue appropriate injunctive relief under the **All Writs Act**, 28 U.S.C. § 1651, to protect its proceedings and the individuals involved in them.

IV. REQUESTED RELIEF

Defendants respectfully request that this Court issue an Order including the following protections:

1. **Prohibit Plaintiff from contacting Defendants directly or indirectly**, including through third parties or social media, outside of formal court filings;
2. **Enjoin Plaintiff from filing further motions or pleadings** in this case without prior leave of Court;
3. **Bar Plaintiff from involving law enforcement** against the Defendants based on any of the matters alleged in this case unless required by subpoena, court order, or emergency criminal conduct;
4. **Restrict access to Defendants' personal contact information** and location;
5. **Prohibit retaliation or harassment** by Plaintiff, including attempts to harm the Defendants' employment, housing, or reputation;
6. **Grant any additional relief** the Court deems just and proper to prevent ongoing harm.

V. CONCLUSION

Plaintiff has demonstrated a consistent pattern of retaliatory and abusive conduct, which goes beyond the bounds of civil litigation. Defendants respectfully ask the Court to grant the requested Order of Protection to ensure their safety, preserve judicial resources, and maintain the integrity of these proceedings.

Respectfully submitted,

Julie Barnes

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